

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

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COMPASS-CHARLOTTE 1031, LLC,	:	
	:	
Plaintiff,	:	
	:	Civ. No. 24-CV-0055 (MAD/CFH)
-against-	:	
	:	
PRIME CAPITAL VENTURES, LLC,	:	
BERONE CAPITAL FUND, LP,	:	
BERONE CAPITAL PARTNERS LLC,	:	
BERONE CAPITAL LLC, BERONE CAPITAL	:	
EQUITY FUND I, LP, and 405 MOTORSPORTS	:	
LLC f/k/a Berone Capital Equity Partners LLC,	:	
	:	
Defendants.	:	
	:	

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**Declaration of Tyler Maulsby**

I, Tyler Maulsby, hereby declare the following under penalty of perjury, pursuant to 28 U.S.C. § 1746:

1. I am an attorney duly admitted to practice before this Court and am a shareholder with the law firm of Frankfurt Kurnit Klein & Selz, P.C., attorneys for non-party Hogan Lovells US LLP (“Hogan Lovells”). I respectfully submit this declaration in connection with Hogan Lovells’ Sur Reply to Plaintiff Compass-Charlotte 1031, LLC’s Motion to Disqualify Hogan Lovells as counsel for Defendant Prime Capital Ventures, LLC (“Prime Capital”).

2. Attached hereto as Exhibit 1 is a true and correct copy of a Stipulation For Substitution of Counsel With Consent dated February 14, 2024 in the matter of *Camshaft CRE I LLC v. Prime Capital Ventures, LLC*, Case No. 23-023173-01 (Miami Dade Cnty.).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 14, 2024

/s/ Tyler Maulsby  
Tyler Maulsby